

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION

CALVASHA SUMMERS, §
Plaintiff, §
vs. §
LYNN P. TORRES, SUPERINTENDENT §
& LUFKIN INDEPENDENT SCHOOL §
DISTRICT, §
Defendants. §

Civil Action No. 9:22-cv-00029-MJT

**UNOPPOSED MOTION TO EXTEND PLAINTIFF'S TIME TO RESPOND TO
DEFENDANTS' MOTION TO DISMISS
FROM AUGUST 1, 2022 UNTIL AUGUST 9, 2022**

Plaintiff Calvasha Summers makes this her unopposed motion to extend her time to respond to Defendants' motion to dismiss from August 1, 2022, until August 9, 2022; and for cause Plaintiff would show the following:

1. Plaintiff's counsel has a major Main Brief due in the USCA Fifth Circuit on August 13, 2022, a Petition for Rehearing per FRAP 40 (where one of the parties is an agency of the United States of America) is coming due, and three state court appellate briefs are planned to be filed.
2. Additionally, Plaintiff's "old, usually solo" counsel (Watts, not Monk) has been and is engaged in scheduling interviews for needed associate counsel.
3. Plaintiff reached out to Defendants' counsel, Ms. Stephanie Hamm and she is unopposed to the extension without Plaintiff's counsel's supply of detail for the needed extension.

Respectfully submitted,
WATTS & COMPANY LAWYERS, LTD.

By: /s/ Larry Watts
Larry Watts

Larry Watts
State Bar No. 20981000
wattstrial@gmail.com
P.O. Box 2214
Missouri City, Texas 77459
Telephone: (281) 431-1500
Facsimile: (877) 797-4055

Brandon Paul Monk
State Bar No. 24048668
4875 Parker Drive
Beaumont, Texas 77705
Telephone: (409) 724-6665
Facsimile (409)729-6665
ATTORNEYS FOR PLAINTIFF

VERIFICATION

I VERIFY ON PENALTY OF PERJURY THAT THE FACTS STATED HEREIN ARE TRUE TO MY PERSONAL KNOWLEDGE.

By: /s/ Larry Watts
Larry Watts

CERTIFICATE OF SERVICE

I CERTIFY THAT A TRUE AND CORRECT COPY OF THIS DOCUMENT HAS BEEN SERVED ON OPPOSING COUNSEL BY FILING WITH THE CLERK'S ELECTRONIC FILING SCHEME ON AUGUST 1, 2022.

By: /s/ Larry Watts
Larry Watts

